

BEFORE THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE

REC'D TN
REGULATORY AUTH.

CONSUMER ADVOCATE DIVISION)
) Docket No. 00-00041
vs.)
)
BELLSOUTH TELECOMMUNICATIONS,) Tariff 00-00041
INC.)

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C. J. ...
EXECUTIVE SECRETARY

MOTION FOR EXTENSION OF TIME TO SUBMIT ISSUES

Comes the Consumer Advocate Division on behalf of Tennessee consumers to respectfully move for an extension of time to submit the attached issues list. For cause the division would show that due to a traffic stoppage that counsel could not return to his office in time to complete and submit the list of issues.

The issues are as follows:

ISSUES FOR LATE PAYMENT CHARGES

1. IS IT THE LEGISLATIVE INTENT OF TENN. CODE ANN. § 65-5-209 (f) THAT RATES FOR OBTAINING AND MAINTAINING BASIC LOCAL EXCHANGE SERVICES DO NOT INCREASE FOR FOUR YEARS FROM THE BEGINNING OF A PRICE REGULATION PLAN?
2. WHETHER RATES FOR BASIC LOCAL EXCHANGE SERVICE INCLUDE ALL RECURRING AND NONRECURRING CHARGES ASSOCIATED WITH BASIC SERVICE?
3. IS COMPENSATION ATTRIBUTABLE TO LATE PAYMENTS FOR BASIC LOCAL EXCHANGE SERVICE A COMPENSATION FOR RECURRING OR NONRECURRING CHARGES?
4. WERE CHARGES ATTRIBUTABLE TO THE RECURRING AND NONRECURRING EXPENSES FOR LATE BASIC LOCAL EXCHANGE SERVICE PAYMENTS ENCOMPASSED IN BELLSOUTH'S RATES ON JUNE 6, 1995?
5. DO TENNESSEE CONSUMERS WHO CONTRACT OR AGREE TO SERVICE PROVIDED BY OTHER TELECOMMUNICATIONS SERVICE PROVIDERS ALSO CONTRACT TO PAY A LATE PAYMENT CHARGE TO BELLSOUTH?

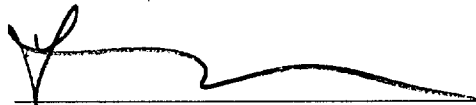
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6. HAS BELLSOUTH SUBMITTED SUBSTANTIAL AND MATERIAL EVIDENCE TO THE TENNESSEE REGULATORY AUTHORITY WHICH SHOWS THAT THE RECURRING AND NONRECURRING EXPENSES AND CHARGES ARISING FROM LATE PAYMENTS OF BASIC LOCAL EXCHANGE SERVICE WAS NOT INCLUDED IN THE BASIC LOCAL EXCHANGE SERVICE RATES ON JUNE 6, 1995?
7. WOULD AN ADDITIONAL LATE CHARGE PAYMENT ADVERSELY AFFECT THE AFFORDABILITY OF BASIC LOCAL EXCHANGE SERVICE?
 - a. WILL RATES REMAIN AFFORDABLE FOR ALL TENNESSEE CONSUMERS?
8. DOES AN ADDITIONAL LATE CHARGE PAYMENT ON NON-BASIC SERVICES PROVIDED BY OTHER SERVICE PROVIDERS AFFECT AFFORDABILITY OF BASIC LOCAL EXCHANGE SERVICE?
 - a. ARE ANY BASIC LOCAL EXCHANGE SERVICES AS DEFINED IN TENN. CODE ANN. § 65-5-208 PROVIDED BY OTHER SERVICE PROVIDERS, BUT BILLED BY BELLSOUTH?
 - b. WOULD A LATE PAYMENT CHARGE AFFECT THE AFFORDABILITY OF THOSE BASIC LOCAL EXCHANGE SERVICES?
9. WHAT ARE THE REVENUES ASSOCIATED WITH THE HUNTING/GROUPING CHARGES?
 - a. ARE ALL OF THE REVENUES RECOVERED IN LOWER RATES?
 - b. ARE THEY OFFSET ON A NON-DISCRIMINATORY BASIS?
10. WHAT ARE THE REVENUES ASSOCIATED WITH EACH AND EVERY SERVICE FOR WHICH BELLSOUTH PROPOSES TO INSTITUTE LATE PAYMENT CHARGES?
 - a. WHICH ARE BASIC LOCAL EXCHANGE SERVICE ASSOCIATED?
 - b. WHICH REVENUES ARE NON-BASIC SERVICE ASSOCIATED?
 - c. WHICH OVERLAP?
 - d. HOW IS THE ALLOCATION OF ANY OVERLAPPING ASSOCIATION MADE?
 - e. WHY IS ANY ALLOCATION PROPOSED BY BELLSOUTH THE "PROPER" ALLOCATION?
11. WERE COSTS INCURRED BY BELLSOUTH IN TRACKING, ADMINISTERING AND COLLECTING PAYMENTS FROM ITS CUSTOMERS AFTER THE PAYMENTS ARE DUE INCLUDED IN THE RECURRING AND NON-RECURRING COSTS, CHARGES AND RATES OF BELLSOUTH FOR BASIC LOCAL EXCHANGE SERVICE ON JUNE 6, 1995?
12. WAS BELLSOUTH RECOVERING ITS COSTS IN TRACKING, ADMINISTERING AND COLLECTING PAYMENTS FROM ITS BASIC LOCAL EXCHANGE SERVICE

CUSTOMERS AFTER THE PAYMENTS ARE DUE, INCLUDED IN ITS RECURRING AND NON-RECURRING CHARGES ON JUNE 6, 1995?

13. IS BELLSOUTH CURRENTLY RECOVERING ITS COSTS IN TRACKING, ADMINISTERING AND COLLECTING PAYMENTS FROM ITS BASIC LOCAL EXCHANGE SERVICE CUSTOMERS AFTER THE PAYMENTS ARE DUE, INCLUDED IN ITS CURRENT RECURRING AND NON-RECURRING CHARGES?
14. IS THE REGULATORY SCHEME BELLSOUTH WAS OPERATING UNDER PRIOR TO OCTOBER 1, 1995 RELEVANT TO THE EXTENT IT CAN PROVIDE EVIDENCE OF WHAT RECURRING AND NON-RECURRING CHARGES ARE LINKED TO BASIC LOCAL EXCHANGE SERVICES AS DEFINED IN TENN. CODE ANN. § 65-5-208 (a)(1)?
15. DOES THE TERM "RATES" IN TENN. CODE ANN. § 65-5-208 (a)(1) INCLUDE ALL RECURRING AND NON-RECURRING CHARGES?
16. IS BELLSOUTH ESTOPPED FROM FROM ALLEGING THAT RATES DO NOT INCLUDE ALL RECURRING AND NON-RECURRING CHARGES WHEN IT VOLUNTARILY APPLIED FOR PRICE REGULATION AND THEREFORE VOLUNTARILY BECAME SUBJECT TO TENN. CODE ANN. § 65-5-208(a)(1)?

Respectfully Submitted,



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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Document has been mailed postage prepaid to the parties listed below this 8 day of March, 2000.

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A handwritten signature in black ink, appearing to read 'L. Vincent Williams', written over a horizontal line.

L. Vincent Williams